

FILED

United States District Court
Middle District Tennessee

JAN 11 PM 1:22

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

) Craig Cunningham
) Plaintiff, Pro-se

)

) v.

)

CIVIL ACTION NO. 3:16-cv-02285

) First Class Vacations, Inc, Rebecca Nahom, Firefly Travel Corp and Peter
Tolman, dba Leads Direct Marketing

) John/Jane Doe 1-10

) Defendants.

**Plaintiff's Affidavit In Support of his Emergency Ex- Parte Request for a temporary
restraining order on Paypal, Inc. for funds held**

My name is Craig Cunningham, and I am the Plaintiff in this case and over the age of 21. I have never been convicted of a felony or crime of moral turpitude, and I am writing this affidavit in support of my motion for an Ex parte Temporary restraining order on Paypal, Inc.

I have spoken with Jeff Nahom and Jeff indicated to me personally on October 8, 2018 that his Paypal Merchant account was frozen by Paypal due to excessive chargebacks and funds were being held at Paypal in the name of First Class Vacations. The Plaintiff learned that over \$90,000 was being held at the time.

I am also aware of Stewart Abramson, a litigant who also sued First Class Vacations and levied upon First Class Vacations Paypal account, so I am aware that creditors other than myself are seeking and obtaining funds from First Class Vacations, which will put additional financial pressure on the Defendant.

I believe that at least \$51,000 remains held in the Paypal account. I noticed that Jeff Nahom also formed what appears to be a new travel corporation in Florida on August 1, 2018, days after the court issued an adverse order against him and required him to obtain an attorney for representation of First Class Vacations.

I believe that Paypal, Inc. is going to shortly payout the remaining funds to First Class Vacations, Inc and the initial freeze by Paypal was only for around 90 days and that the funds may be paid out any day very soon.

In conversations with Jeff Nahom, he indicated that he had formed a new corporation and was intent on staying in the Travel industry business, but was having great financial difficulties with First Class Vacations at the time. It appears to me that Jeff Nahom is attempting to transfer assets to his new corporation Luxury Vacation Holdings from First Class Vacations, Inc.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on
Jan 11, 2018



Craig Cunningham
Plaintiff,

5543 Edmondson Pike, ste 248
Nashville, TN 37211
615-348-1977
1/11/2019

Craig Cunningham
5543 Edmondson Pike #248
Nashville, TN 37211

Federal Court Clerk
801 Broadway
Nashville, TN 37203